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June 10, 2020

Via ECF

Honorable Joel Schneider, U.S.M.J.
District of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: In re Valsartan, Losartan, and Irbesartan Litigation
Case No. 1:19-md-02875-RBK-JS

Dear Judge Schneider:

Our office represents defendants, Hetero Labs, Ltd. and Hetero Drugs (jointly “Hetero Labs”), in the above-referenced litigation. We submit this correspondence to apprise the Court of Hetero Labs’ meet-and-confer with plaintiffs’ counsel regarding the pending Motion to Modify ESI Search Terms. It was recently represented to the court that Hetero Labs had not reached out to plaintiffs to discuss ESI search terms. That statement was made in error.

As the Court is aware, Hetero Labs and plaintiffs have not yet consolidated a list of custodians. Custodians cannot be finalized until such time as core production has been completed. Pursuant to discussions between Hetero Labs and plaintiffs, the agreed upon a core document discovery deadline for Hetero Labs is July 31, 2020.

On June 10, 2020, the undersigned had a teleconference with plaintiffs’ counsel regarding custodians and ESI production. The parties agreed that no later than Friday, June 12, 2020, Hetero Labs will provide its third core discovery production. Included in that production will be the identity of custodians whose names will be included in the ESI search terms. Following plaintiffs’ review and approval, or amendment, of that list of custodians, Hetero Labs will run initial searches for hit counts and data load.

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Counsel for Hetero Labs and plaintiffs will continue their dialogue with reference to potential modification of search terms dependent upon the document count and data loads returned from the initial ESI search. The parties are confident that a resolution will be reached without the need for further intervention from the Court. Nevertheless, we remain available at the Court's convenience to discuss this matter further.

Very truly yours,
HILL WALLACK LLP

/s/ Eric I. Abraham

Eric Abraham, Esq.
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Nakul Y. Shah, Esq.